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11 ATTORNEYS FOR DEFENDANTS DENNIS HAGOBIAN,
12 VICTORIA HAGOBIAN, THE DENNIS HAGOBIAN RESIDENTIAL
13 TRUST, THE VICTORIA HAGOBIAN RESIDENTIAL TRUST,
14 AND YOSEMITE TECHNOLOGIES, INC., AND
15 SPECIALLY APPEARING FOR ROD CHRISTENSEN

16 UNITED STATES DISTRICT COURT
17 EASTERN DISTRICT OF CALIFORNIA
18 FRESNO DIVISION

19 JOE FLORES an individual, and CONNIE
20 FLORES an individual,

21 Plaintiffs,

22 vs.

23 CASE NO. 1:05-CV-0291 REC DLB
24 STIPULATION AND ORDER
25 CONTINUING HEARING DATE ON
26 MOTIONS TO DISMISS

27 EMERICH & FIKE a professional corporation,
28 a.k.a. EMERICH PEDREIRA & FIKE, a
professional corporation, DAVID R.
EMERICH an individual, DAVID A. FIKE an
individual, JEFFREY D. SIMONIAN an
individual, THOMAS A. PEDREIRA an
individual, LAWRENCE E. WESTERLUND
an individual, DENNIS HAGOBIAN an
individual, is or was President, Chief Executive
Officer, Chief Financial Officer and Chief
Operating Officer of Yosemite Technologies,
Inc., VICTORIA HAGOBIAN an individual,
THE DENNIS HAGOBIAN RESIDENCE
TRUST a trust, THE VICTORIA HAGOBIAN
RESIDENCE TRUST a trust, DENNIS
VARTAN an individual, SANDY L. VARTAN
an individual, THE DENNIS VARTAN
FAMILY TRUST a trust, JUDITH
YERAMIAN an individual, THE LEE
YERAMIAN EXEMPT QTIP TRUST a trust,
THE JUDITH MARY YERAMIAN FAMILY

1 a trust, W.D. FARMING LLC a limited liability
2 corporation, RUSSELL DAVIDSON an
3 individual, WILLIAM DAVIDSON an
4 individual, MICHAEL HEDBERG an
5 individual, ROD CHRISTENSEN an
6 individual, Co-Founder and Chief Technology
7 Officer of Yosemite Technologies, Inc.,
8 YOSEMITE TECHNOLOGIES, INC. a
9 corporation, and DOES 1 through 140,
10 inclusive,

11 Defendants.

12 Defendants Dennis Hagobian, Victoria Hagobian, the Dennis Hagobian Residential Trust, the
13 Victoria Hagobian Residential Trust, Yosemite Technologies, Inc. and Rod Christensen, along with
14 Defendants Sandy Vartan, individually, Judith Yeramian, individually and as trustee of The Judith
15 Mary Yeramian Family Trust and The Lee Yeramian Exempt QTIP Trust, Russell Davidson, and
16 W.D. Farming, LLC, by and through their respective undersigned counsel, join with Joe Flores and
17 Connie Flores, Plaintiffs in pro se, to stipulate as follows:

18 1. WHEREAS on or about March 13, 2006, Plaintiffs filed their First Amended
19 Complaint; and

20 2. WHEREAS on or about April 13, 2007, the Court issued its Order Re Status Of Stay
21 Of Action. Pursuant to that Order, all defendants who had not yet appeared were given through
22 May 5, 2007 (a Saturday) to respond to the First Amended Complaint; and

23 3. WHEREAS on May 4, 2007, Dennis Hagobian, Victoria Hagobian, the Dennis
24 Hagobian Residential Trust, the Victoria Hagobian Residential Trust, Yosemite Technologies, Inc.
25 and Rod Christensen (collectively, the "Hagobian Defendants") filed their Notice of Motion and
26 Motion to Dismiss for Failure to State a Cause of Action, along with accompanying documents; and

27 4. WHEREAS on May 7, 2007 (the next court day after the due date), Russell Davidson
28 and W.D. Farming, LLC joined in the Hagobian Defendants' Motion to Dismiss; and

5. WHEREAS on May 7, 2007 (the next court day after the due date) Sandy Vartan,
individually, and Judith Yeramian, individually and as trustee of The Judith Mary Yeramian Family
Trust and The Lee Yeramian Exempt QTIP Trust (collectively, the "Yeramian Defendants") filed
their Motion to Dismiss Pursuant to Fed.R.Civ.Proc. 12(b); and

6. WHEREAS the hearing on the Defendants' motions was scheduled for June 4, 2007;
and

7. WHEREAS the Plaintiffs and the Defendants agreed to a continuance of the hearing
date; and

8. WHEREAS, no previous extension of time has been requested with regard to the
Motions to Dismiss referenced herein; and

9. WHEREAS the requested extension will not affect any court-ordered deadlines;

IT IS PROPOSED AND STIPULATED THAT:

1. The hearing on the Hagobian Defendants' Motion to Dismiss, joined by Russell
Davidson and W.D. Farming, LLC, shall be continued to June 18, 2007 at 10:00 a.m.; and

2. The hearing on the Yeramian Defendants' Motion to Dismiss shall be continued to
June 18, 2007 at 10:00 a.m.; and

3. Plaintiffs shall respond to the Hagobian Defendants' Motion to Dismiss and the
Yeramian Defendants' Motion to Dismiss in accordance with the Eastern District of California Local
Rules based upon the June 18, 2007 hearing date.

IT IS SO STIPULATED.

DATED: MAY 10, 2007

BERLINER COHEN

BY: /s/ LAURA A. PALAZZOLO

RALPH J. SWANSON

LAURA PALAZZOLO

ATTORNEYS FOR DEFENDANTS DENNIS

HAGOBIAN, VICTORIA HAGOBIAN, THE DENNIS

HAGOBIAN RESIDENTIAL TRUST, THE VICTORIA

HAGOBIAN RESIDENTIAL TRUST, YOSEMITE

TECHNOLOGIES, INC.; AND

SPECIALLY APPEARING FOR ROD CHRISTENSEN

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1 DATED: MAY ____, 2007

CASWELL BELL & HILLISON LLP

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3 BY: /S/ RUSSELL G. VANROZEBOOM
RUSSELL G. VANROZEBOOM

4 ATTORNEYS FOR DEFENDANTS SANDY VARTAN,
5 INDIVIDUALLY, AND JUDITH YERAMIAN,
6 INDIVIDUALLY AND AS TRUSTEE OF THE JUDITH
MARY YERAMIAN FAMILY TRUST AND THE LEE
YERAMIAN EXEMPT QTIP TRUST

7 DATED: MAY ____, 2007

CRONE ROZYNKO

8
9 BY: /S/ SEAN O'HALLORAN

10 SEAN O'HALLORAN
11 ATTORNEYS FOR DEFENDANTS RUSSELL
DAVIDSON AND W.D. FARMING LLC

12 DATED: MAY 10, 2007

13
14 BY: /S/ JOE FLORES
15 JOE FLORES
IN PRO SE

16 DATED: MAY 10, 2007

17
18 BY: /S/ CONNIE FLORES
19 CONNIE FLORES
20 IN PRO SE

21 IT IS SO ORDERED.

22
23 DATED: MAY 11, 2007

24 /S/ OLIVER W. WANGER
25 HON. OLIVER WANGER
26 DISTRICT COURT JUDGE
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